

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MICHAEL DOBKIN, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

ENTERPRISE FINANCIAL GROUP,
INC., a Texas corporation, and
PRECISE ENTERPRISES LLC d/b/a
Precise Auto Protection, a California
limited liability company,

Defendants.

Case No. 2:14-cv-01989-WHW-CLW

Judge William H. Walls

Magistrate Judge Cathy L. Waldor

**SIPULATION AND PROPOSED
ORDER FOR EXTENSION OF
TIME FOR PLAINTIFF TO FILE
AN OPPOSITION OR OTHERWISE
RESPOND TO DEFENDANT’S
MOTION TO DISMISS AND FOR
DEFENDANT’S REPLY**

Pursuant to Civil Local Rule 6.1(b), Plaintiff Michael Dobkin (“Plaintiff” or “Dobkin”) and Defendant Enterprise Financial Group, Inc. (“Defendant” or “EFG”) (collectively, the “Parties”) hereby jointly move for an application to the Clerk of the United States District Court for the District of New Jersey for entry of an Order granting Plaintiff a seven (7) day extension of the time to file an opposition or otherwise respond to Defendant’s Motion to Dismiss. Additionally, the Parties move for an application to the Clerk for entry of an Order granting Defendant a 14-day extension of the time to file a reply. In support of this application, the Parties state as follows:

1. Service of Defendant's Motion to Dismiss was effectuated upon Plaintiff's Counsel on June 20, 2014 through the Court's CM/ECF electronic filing system.

2. There have been no prior extensions of time for Plaintiff to file an opposition or otherwise respond to Defendant's Motion to Dismiss.

3. Absent this extension, Plaintiff Dobkin's time to file an opposition or otherwise respond to Defendant EFG's Motion to Dismiss will expire on July 7, 2014.

4. If this extension is granted, Plaintiff's Opposition or other response to Defendant's Motion to Dismiss will be due on July 14, 2014.

5. There have been no prior extensions of time for Defendant to file a reply to Plaintiff's opposition to Defendant's Motion to Dismiss.

6. Absent this extension, Defendant's time to file a response will expire on July 14, 2014.

7. If this extension is granted, Defendant's reply to Plaintiff's Opposition will be due on July 28, 2014.

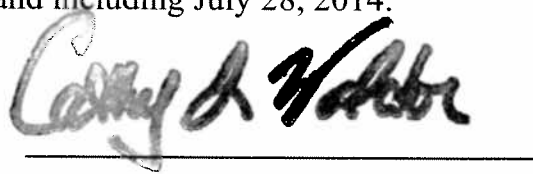
WHEREFORE, the Parties respectfully request that the Clerk of the United States District Court for the District of New Jersey enter an Order extending the deadline for Plaintiff to file an Opposition to Defendant's Motion to Dismiss through and including July 14, 2014. Additionally, the Parties respectfully request that the Clerk enter an Order extending the deadline for Defendant to file a reply through and including July 28, 2014.

IT IS, on this 9 day of July, 2014,

ORDERED that Plaintiff's deadline to file an Opposition to Defendant's Motion to Dismiss is extended through and including July 14, 2014; and it is further

ORDERED that Enterprise Financial's deadline to file a Reply in support of its Motion to Dismiss is extended through and including July 28, 2014.

SO ORDERED.



Hon. Cathy L. Waldor, U.S.M.J.

Respectfully submitted,

MICHAEL DOBKIN, individually and
on behalf of all others similarly situated,

Dated: July 7, 2014

By: /s/ Stefan L. Coleman
One of Plaintiff's Attorneys

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*Attorneys for Plaintiff Michael Dobkin
and the putative Class*

**ENTERPRISE FINANCIAL GROUP,
INC.**

Dated: July 7, 2014

By: /s/ Michael R. McDonald
One of Defendant's Attorneys

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